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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF JOINT STIPULATION AND  
[PROPOSED] ORDER FURTHER  
EXTENDING TIME FOR GOOGLE TO  
SUBMIT DECLARATION IN SUPPORT  
OF PLAINTIFFS' MOTION TO SEAL  
(DKT. 429)**

Referral: The Honorable Susan van Keulen

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 6-2 and 7-12, I submit this declaration in support of the  
7 Joint Stipulation and [Proposed] Order Extending Time for Google to its Declaration in Support of  
8 Plaintiffs’ Administrative Motion To Consider Whether Portions Of Plaintiffs’ Request For Order  
9 To Show Cause Re: Sanctions For Google’s Discovery Misconduct (“Stipulation”).

10 3. On February 26, 2022, Plaintiffs filed their Administrative Motion To Consider  
11 Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s  
12 Discovery Misconduct (“Motion to Seal”) (Dkt. 429).

13 4. On February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion to  
14 Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with Dkts.  
15 429, 430.

16 5. Pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the Designating  
17 Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material is sealable,  
18 was March 5, 2022.

19 6. The Parties agreed on, and the Court approved, an extension of time to March 16,  
20 2022 for Google to respond to Plaintiffs’ Motion to Seal (Dkt. 448);

21 7. On March 15, 2022, the Parties met and conferred, and agreed that an additional  
22 extension of time of seven days will provide Google with sufficient time to review the materials in  
23 Plaintiffs’ Motion to Seal that Google designated as confidential and to submit its declaration in  
24 support its designated material in the filings (Dkt. 429).

25 8. The Court has previously modified the case schedule by extending Plaintiffs’  
26 deadline to file a brief response to the affidavit and declaration submitted in response to the Court’s  
27 request (Dkt. 110), the deadline for special master submissions (Dkt. 206), and to submit joint case  
28 management statement (Dkt. 388), and has also granted the parties’ stipulations to extend the time

1 to answer the complaint (Dkt. 42), submit protective order and ESI order (Dkt. 72), submit motion  
2 to dismiss briefing (Dkt. 73), submit proposed redactions to the April 27, 2021 hearing transcript  
3 (Dkt. 163) and June 2, 2021 hearing transcript (Dkt. 246), submit a declaration in support of  
4 Plaintiffs' motion to seal (Dkts. 294, 367, 408), file Google's motion for protective order (Dkt. 301),  
5 respond to third-party subpoenas (Dkts. 347-50), answer the Second Amended Complaint (Dkt.  
6 377), and to seal Plaintiffs' motion for sanctions (Dkt. 448). The Court has further granted the  
7 parties' stipulations setting a briefing schedule for Google's motion to dismiss Counts Six and Seven  
8 of the Second Amended Complaint (Dkt. 175) and continuing several discovery and motion  
9 deadlines (Dkts. 261, 377), including the deadlines for the close of fact discovery, opening and  
10 rebuttal expert reports, close of expert discovery, filing motion for class certification, and the class  
11 certification hearing.

12 9. The seven-day extension will not affect the schedule in this case.

13 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
14 and correct. Executed in San Francisco, California on March 15, 2022.

15  
16 DATED: March 15, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

17  
18 By /s/ Jonathan Tse  
Jonathan Tse

19 *Attorney for Defendant*  
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